



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

**EPA WARNING LETTER**

Ms. Lauren Kosinski  
EHS Supervisor  
Solenis, LLC - Portland Plant  
3366 NW Yeon Avenue  
Portland, Oregon 97210

Re: Risk Management Program Compliance Inspection  
Solenis, LLC - Portland Plant  
EPA Facility ID# 1000 0015 4888

Dear Ms. Kosinski:

On April 22, 2015 the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Solenis, LLC - Portland Plant, located at 3366 NW Yeon Avenue, Portland, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below is an area of concern identified by EPA:

**Management of Change:** Solenis, LLC failed to implement written procedures to manage changes made to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process as required by 40 C.F.R. § 68.75(a). Solenis, LLC was unable to produce documentation that a management of change (MOC) was completed for the addition of the automated safety valve and the revised procedures addressing the incident report findings of the January 1, 2011 Epi release caused by a defoamer valve that was left open on the large kettle at the Epi tank, during and after the Epi drop, allowing fumes to leave the kettle, placing an operator at risk.

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: [http://www.epa.gov/emergencies/content/rmp/rmp\\_guidance.htm#General](http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General)

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or [morales.javier@epa.gov](mailto:morales.javier@epa.gov).

Sincerely,

Kelly McFadden, Manager  
Pesticides and Toxics Unit

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CONCURRENCE					
NAME	Javier Morales				
INITIAL					
DATE					